

Exhibit B

Luetkemeyer, Lucinda

Subject: FW: Case 1:18-cv-02185-JGK Eastern Profit Corporation Limited v. Strategic Vision US LLC

From: Teske, Erin [<mailto:ETeske@hodgsonruss.com>]

Sent: Wednesday, December 11, 2019 2:15 PM

To: Luetkemeyer, Lucinda

Cc: Cline, Joanna J.; Lawall, Francis; Harmon, Mark; Chuff, Christopher B.; Greim, Edward D.; Donnelly, Jennifer

Subject: RE: Case 1:18-cv-02185-JGK Eastern Profit Corporation Limited v. Strategic Vision US LLC

Lucinda,

I disagree with your synopsis below. Judge Freeman has directed your client to provide a specific basis for a narrow, tailored request. The position I articulated was, and continues to be, that when you are prepared to discuss your basis for requesting specific information – which you were not willing to do during our call – then we will have something on which to confer. We cannot confer in a vacuum.

Erin N. Teske

Hodgson Russ LLP

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From: Luetkemeyer, Lucinda <LLuetkemeyer@gravesgarrett.com>

Sent: Tuesday, December 10, 2019 1:47 PM

To: Teske, Erin <ETeske@hodgsonruss.com>

Cc: Cline, Joanna J. <CLINEJ@pepperlaw.com>; Lawall, Francis <LAWALLF@pepperlaw.com>; Harmon, Mark <MHarmon@hodgsonruss.com>; Chuff, Christopher B. <chuffc@pepperlaw.com>; Greim, Edward D. <EDGreim@gravesgarrett.com>; Donnelly, Jennifer <JDonnelly@gravesgarrett.com>

Subject: RE: Case 1:18-cv-02185-JGK Eastern Profit Corporation Limited v. Strategic Vision US LLC

Erin,

Thank you for your time on the phone this morning to discuss the scope of your objections to the outstanding subpoenas to AT&T and to Google (Gmail/YouTube). To recap our conversation:

- You are making a blanket, relevance objection to the following: the Oct. 22 subpoena to AT&T for 8 phone numbers; the Oct. 31, 2019 subpoena to Google seeking information related to five YouTube accounts; the Nov. 4 subpoena to Google seeking information related to three YouTube accounts; and the Nov. 4 subpoena to Google seeking information related to six Gmail addresses.
- You refused to inform us which accounts and email addresses listed in the various subpoenas belong to your clients. Instead, you indicated that you were objecting to each of the subpoenas in their entirety even though you may not represent owners of all of the accounts listed.
- You refused to specify which of the YouTube accounts listed belongs to Mr. Guo, nor would you say which of the six email addresses belongs to Mr. Guo or Ms. Wang. You refused to specify to which accounts you referred in your November 8 letter motion (“*One of the three YouTube accounts and one of the six email addresses for which information is requested are Mr. Guo’s and one of the six email addresses is that of Yvette Wang.*”)

- Your position is that we must make a showing that the information sought is relevant *before* you will decide whether to tell us on whose behalf you are objecting, as you believe the subpoenas request information that could relate to your clients.
- We offered the possibility of narrowing the subpoenas if we could learn which of the accounts listed belonged to your clients. You would not provide the basis for your objecting to the subpoenas in their entirety, nor would you say which of the Gmail addresses belong to your clients: CALVINHO77777@GMAIL.COM, GSPRINGGROUP@GMAIL.COM, YVETTE.YUE423@GMAIL.COM, RLRPG@GMAIL.COM, WENGUIGUO@GMAIL.COM, SARAWEI31@GMAIL.COM
- You refused to withdraw objections to the portions of the YouTube subpoenas seeking information from Guo Media YouTube accounts. You did say that you have not represented Guo Media to date.

If any of the above is incorrect, please let us know. We agree that these issues must be raised before the Court and resolved quickly. We will inquire about the Court's availability. You had mentioned Friday; unfortunately, I am traveling out of state then, but we will work to find a date next week that works for everyone. What is your availability next week?

Thank you,

Lucinda Luetkemeyer